

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND**

IN RE:

Michelle Quarles aka Michelle W. Quarles  
Aka Michelle Washington Quarles  
Debtor(s)

Case No. 17-15211-WIL  
Chapter 11

**RESPONSE TO DEBTOR'S OBJECTION TO CLAIM**

COMES NOW, U.S. Bank Trust National Association as Trustee of Cabana Series III Trust ("Respondent"), by and through undersigned counsel and hereby responds to the Objection to Claim filed herein and in support thereof states as follows:

1. Respondent admits the allegations contained within Paragraph 1.
2. Respondent lacks information to either admit or deny the allegations set forth in paragraph 2.
3. Respondent admits the allegations contained within Paragraph 3.
4. In response to paragraph 4, Respondent states that the terms of the confirmed Chapter 11 Plan speak for themselves.
5. Respondent denies the allegations contained within Paragraph 5 insofar as they allege that Respondent has charge impermissible fees to the underlying loan.
6. Respondent lacks the information to either admit or deny the allegations set forth in paragraph 6.
7. Respondent lacks the information to either admit or deny the allegations set forth in paragraph 6.
8. The allegations set forth in paragraph 8 and 9 do not require a response.
9. Respondent is in the process of processing the filing of a transfer of claim from Wells Fargo Bank, N.A. to itself.

WHEREFORE, Respondent, by and through undersigned counsel respectfully requests that this honorable court deny the Objection to Claim and for such other and further relief as this court deems just and proper.

Respectfully Submitted,

/s/ Joshua Welborn, Esq. (Jwel)  
Joshua Welborn, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that copies were sent electronically via the CM/ECF system on February 8, 2019 to:

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/s/ Joshua Welborn, Esq.